







Railroad Commission of Texas

Drilling Permits – Common Issues and Statewide Rule Exceptions

August 19, 2021

The meeting will begin shortly.





















Common Issues and Statewide Rule Exceptions

Lorenzo Garza

August 2021















Power Point Presentation



This presentation is available for download from the RRC website at https://www.rrc.texas.gov/oil-and-gas/workshops-and-conferences/rrc-regulatory-webinars-2021-schedule/

AVOIDING COMMON PITFALLS



UNDERSTANDING TERMINOLOGY

W-1 ISSUES

PLAT ISSUES

NOTIFICATION ISSUES

EXCEPTION RESOLUTIONS

TERMINOLOGY-PURPOSE OF FILING(ACTUAL WORK)

- New Drill Any proposed operation where there is currently no established wellbore.

Re-Completion – Any proposed operation where you
will be either plugging back or deepening into a new
regulatory zone. Could also include changing of
the profile of the well.

 Re-entry – Any proposed operation where you will be re-entering a wellbore that has been plugged to surface.

TERMINOLOGY-PURPOSE OF FILING



These applications are filed to correct well classification or field associated to the well. No actual work has been done to the well and applies to already completed wells on schedule.

- Re-class A change in classification of a well from oil to gas or gas to oil, as well as to change a disposal or injection well to a producer.
- Field Transfer Transferring well completed in one regulatory field into another regulatory field. Must have written authority from Commission geologist to do so.

TERMINOLOGY-WELLBORE



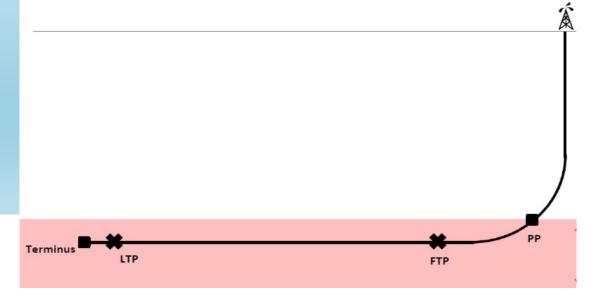
- HORIZONTAL WELL- A well that is directionally drilled containing 5 main parts: a) surface location b) penetration point c) first take point d) last take point, and e) terminus location
- HORIZONTAL DRAINHOLE- That portion of the horizontal wellbore between the first and last take point that is drilled into the correlative interval as designated by field rules.
- TAKE POINT- Any point on a horizontal drainhole that is open to the formation that allows hydrocarbons to flow into the wellbore.

TAKE POINT DEFINITION



Knowing and understanding this simple concept will help you in determining when an exception is needed.

A take point in a horizontal drainhole well is defined as any point along a horizontal drainhole where oil and/or gas can be produced from the correlative interval



TERMINOLOGY-EXCEPTIONS



- OFFSET- Refers to the operator, lessee, or unleased mineral owner of a tract that is adjacent to the lease/unit the application is being applied for.
- WAIVER- A letter signed by an identified offset. In that letter the offset is requested to waive their right to protest the granting of the needed exception to a Statewide or Field Rule.
- AFFECTED PARTY- Determined by Statewide or Field Rules and reason for the notification or exception.

FORM W-1 ISSUES



Your W-1 Should be A "Mirror" of Your Plat

Learn and understand Statewide Rule 5

- Verify that your plat satisfies SWR 5
- Use the info on your correct plat to complete your W-1
- Remember that most of the information used to fill out the Form W-1 should be on the plat

PLAT REQUIREMENTS UNDER SWR 5



You must submit a plat with your application.

- The plat must
 - Use a standard scale (e.g., 1'' = 1000')
 - Show scale and north arrow
 - Show current operator, current lease name, current lease size and county
 - Show the entire lease or pooled unit
 - Show lease outline in heavy line or crosshatching
 - GPS coordinates for the surface location

UNDERSTANDING "PERPENDICULAR"



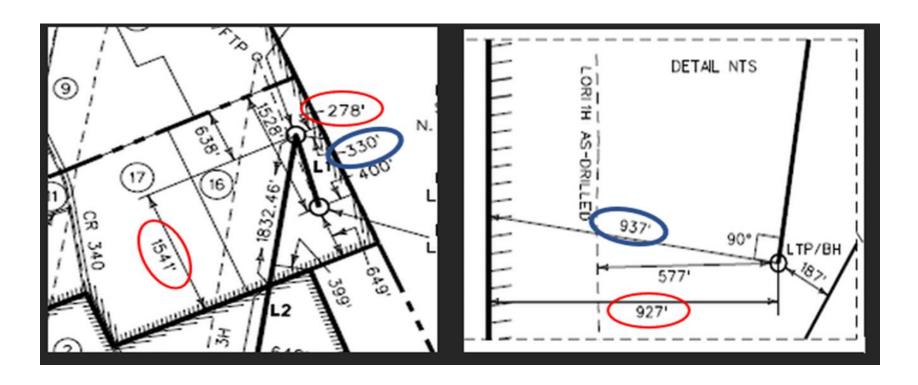
For SWR 5 purposes the plat must show the perpendicular (90 degree) call from the lease line to the part of the well being identified.

For SWR 37 purposes the plat must show the perpendicular (90 degree) call from the productive part of the well to the lease line.

In some instances, the distance identified could be the same but as will be shown this is not always the case.

"PERPENDICULAR" EXAMPLE





The distances circled in red satisfy the SWR 5 requirements of calls from the lease line to the part of the well being described. The distances circled in blue satisfy SWR 37 requirements to show that the well complies to spacing rules by showing distance from a take point to the lease line for those fields that have "Special" horizontal field rules.

PLAT ISSUES



WELL LOCATION PLAT

- Lease/Unit boundaries not clearly identified on the plat
- For horizontal wellbores the 5 main parts not clearly labeled on the plat
- Perpendicular calls not provided on the plat

UNIT/DEVELOPMENT PLAT

- Lease/Unit line calls to exterior boundary not provided
- Acreage for tracts does not match supporting documentation
- If any tract contains unleased mineral interest distance from the well to that tract

PLAT ISSUES CONTINUED



FORM W-1

- Current operator and/or current lease/unit name missing
- Acreage identified on plat is not supported by application
- Lat/Long or X/Y coordinates missing from the plat

SWR 37

- Distance to the nearest lease line not provided particularly to units with unleased interests identified
- Distance to the nearest well in the applied for fields not provided
- If an exception is triggered affected offset parties not clearly identified on the plat

NOTIFICATION



COMMISSION IS RESPONSIBLE

- The Railroad Commission will generate and distribute to all identified parties the applicant has provided for on the service list for a SWR 37 or SWR 38 exception.
- If a notice is returned the Railroad Commission will send out a Supplemental Notice to the new address the applicant must provide.

OPERATOR IS RESPONSIBLE

- The applicant will send out to affected parties as determined by Statewide or Field Rules for any request for an off-lease penetration point. The applicant must wait for the prescribed period before submission of the permit application.
- Any party identified for a SWR 40 exception request.

RESOLUTION TO EXCEPTIONS



 Clearly identifying on the certified plat all affected offset parties.

 Submitting the Publisher's Affidavit once the publication has run.

 Missing the prescribed period for publication because the first date of publication did not fall within seven days of the issuance date.

QUESTIONS?





STATEWIDE RULE 37 & 38



Overview

- Triggers
- Non-Perforation Zone (NPZ) Requirements
- Drilling Permit Exception Checks
- Plat Requirements
- SWR Resolutions & Notification Parameters
- NOA by Publication Requirements

WHAT IS NOT A STATEWIDE RULE 37 TRIGGER



What Doesn't Trigger a SWR 37 Violation?

- Location of my Penetration Point, unless it is also a take point, to a lease line
- An Off-Lease Penetration Point
- An Off-Lease Surface Location
- Correct usage of a Non-Perforation Zone

STATEWIDE RULE 37 TRIGGERS



What Can Trigger a SWR 37 Violation?

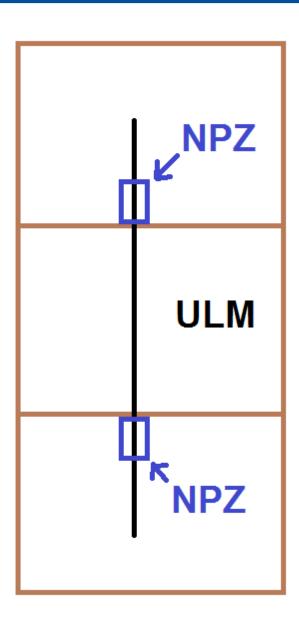
- Productive portion of my well is too close to an exterior lease line
- Productive portion of my well is too close to an interior tract line within my pooled unit that is not completely leased or pooled
- Productive portion of my well is too close to another well in the same field on my lease

NPZ- ISOLATING ONE TRACT



Field With or Without Special Horizontal Rules

- Wellbore
- Lease Line
- NPZ's

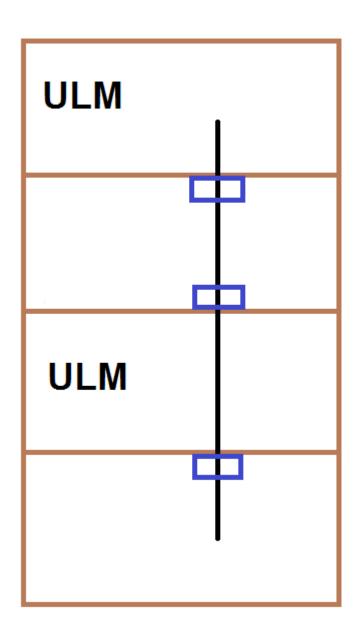


NPZ ISOLATING TWO TRACTS



Field with and without special horizontal rules

- Wellbore
- Lease Line
- NPZ's

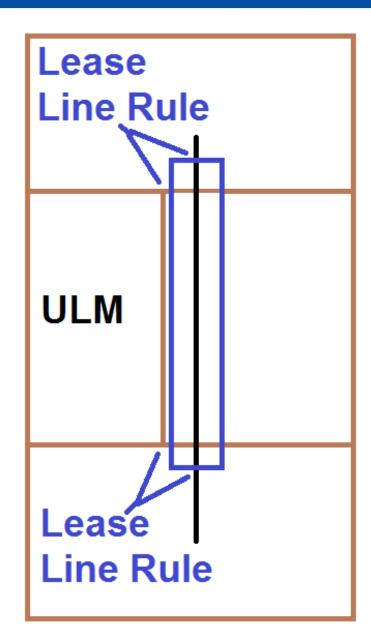


NPZ ISOLATING WHEN PARALLEL WO/SPECIAL RULES



Field Without Special Horizontal Rules

- Wellbore
- Lease Line
- NPZ's



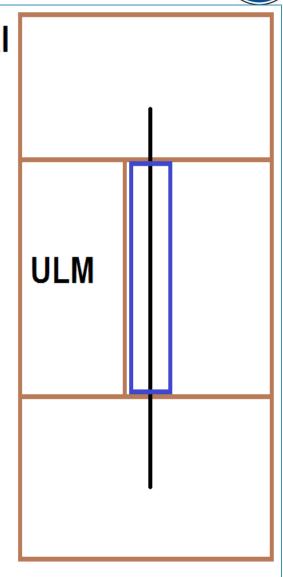
NPZ ISOLATING WHEN PARALLEL W/SPECIAL RULES #1



When your wellbore is *more* than the first/last take point distance from the tract with unleased minerals.

Field With Special Horizontal Rules Only

- Wellbore
- Lease Line
- NPZ's



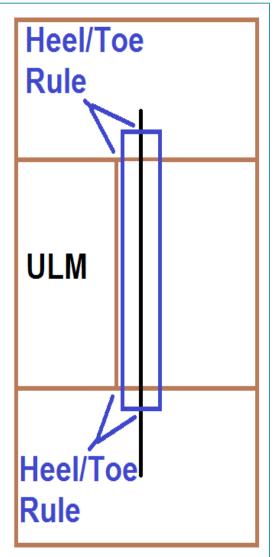
NPZ ISOLATING WHEN PARALLEL W/SPECIAL RULES #2



When your wellbore is *less* than the first/last take point distance from the tract with unleased minerals.

Field with Special Horizontal Rules

- Wellbore
- Lease Line
- NPZ's

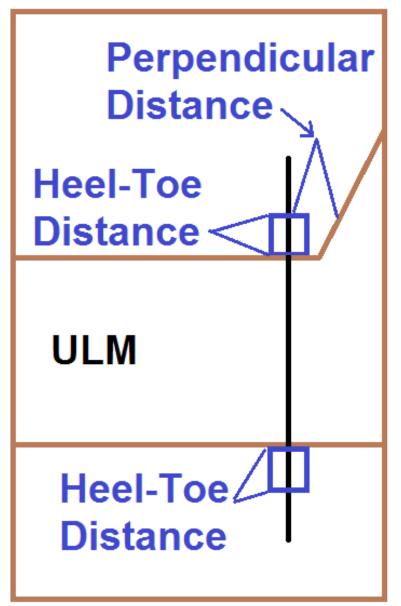


NPZ Dual Spacing Compliance



Field With Special Horizontal Rules Only

- Wellbore
- Lease Line
- NPZ's

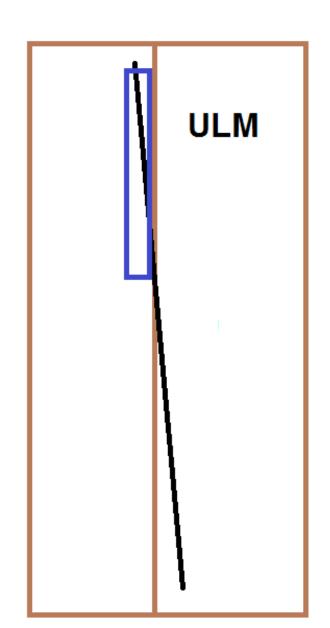


NPZ Special Cases



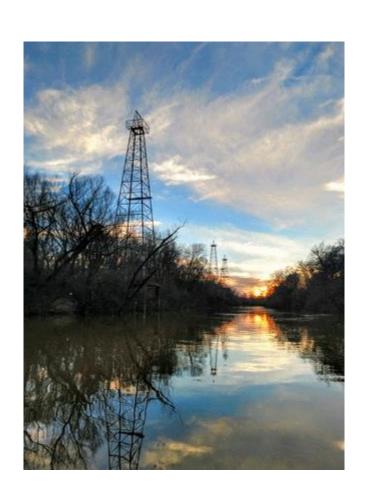
Field With or Without Special Horizontal Rules

- Wellbore
- Lease Line
- NPZ's



DRILLING PERMIT EXCEPTION CHECKS





SWR 37 Lease Line Trigger Checks

- Vertical
- Directional
- Horizontal
- Horizontal withSpecial Rules

STATEWIDE RULE 37 NOTIFICATION- LEASE LINE



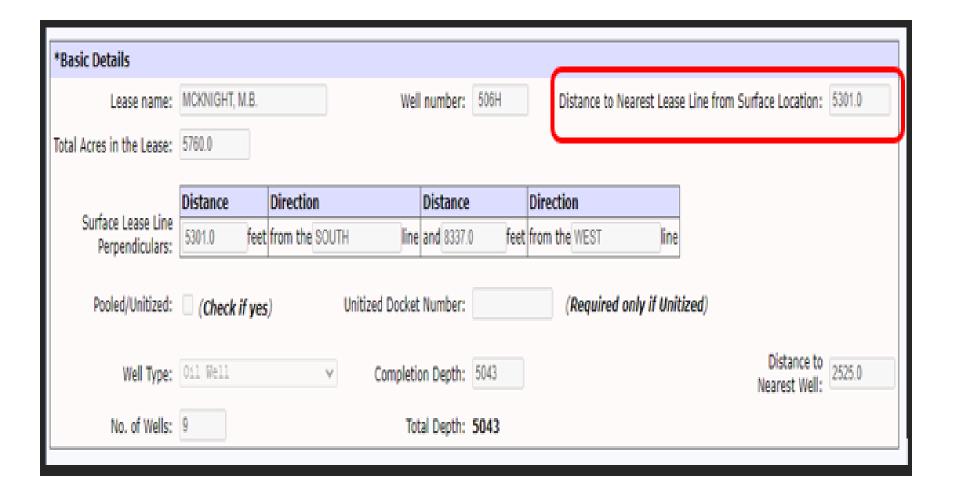


Notification Parameters

- Offsets within the greater of the lease line spacing or 1/2 of the between well spacing
- Fields with special horizontal rules and between well spacing have the same notice area as above
- If no between well spacing, the notice area is the same as the lease line spacing

VERTICAL WELL CHECK



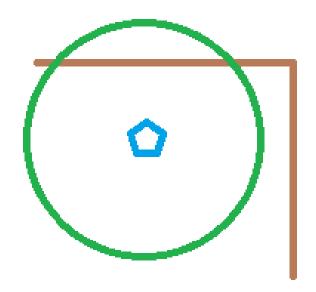


STATEWIDE RULE 37 LEASE LINE- VERTICAL



Vertical

- 🖒 SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



DIRECTIONAL WELL CHECK



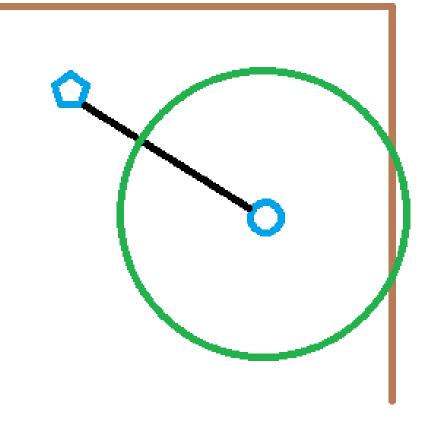
Wellbore Profile											
Distance to Nearest Lease Line from Bottomhole Location: 1117.0											
Enter Abstract #, select the County and click Auto-Populate, or fill in Survey, Section, and Block manually.											
Section: 7 Block: Survey: PERRY, J F / AUSTIN, E M											
Abstract #: A- 110 County: BRAZORIA ✓ Auto-Populate											
Additional information about the location:											
Delete	Name	Profile		Distance (ft)		Direction		Distance (ft)	Direction		
	BH1	Bottomhole	Lease	1117.0 fe	eet	from the NW	line	and 1354.0 fe	from the NE	line	
			Survey	1354.0 fe	eet	from the NE	line	and 5696.0 fe	et from the SE	line	

STATEWIDE RULE 37 LEASE LINE- DIRECTIONAL



Directional

- SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



HORIZONTAL –NO SPECIAL RULES



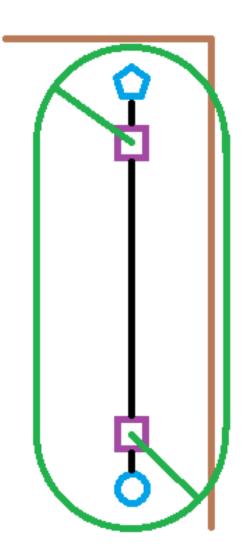
Wellbor	e Profil	e									
Add Additional Terminus Location											
Nearest Distance from Any Take Point to a Lease Line: 467.0 Enter Abstract #, select the County and click Auto-Populate, or fill in Survey, Section, and Block manually.											
Section: 101 Block: 16 Survey: H&TC RR CO											
Abstract #: A- 123 County: HARDEMAN V Auto-Populate											
Additional information about the location:											
Delete	Name	e Profile		Distance (ft)		Direction	Distance (ft)	Direction			
	TH1	Terminus Point	Lease	467.0 fe	eet	from the north line	and 1512.0 feet	from the west line			
			Survey	467.0 fe	eet	from the north line	and 1512.0 feet	from the west line			
		Last Take Point	Lease	467.0 fe	eet	from the north line	and 1512.0 feet	from the west line			
		First Take Point	Lease	1492.0 fe	eet	from the south line	and 801.0 feet	from the east line			
		Penetration Point	Lease	1492.0 fe	eet	from the south line	and 801.0 feet	from the east line			

STATEWIDE RULE 37 LEASE LINE- HORIZONTAL



Horizontal

- ♦ SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



HORIZONTAL-SPECIAL DUAL LEASE LINE

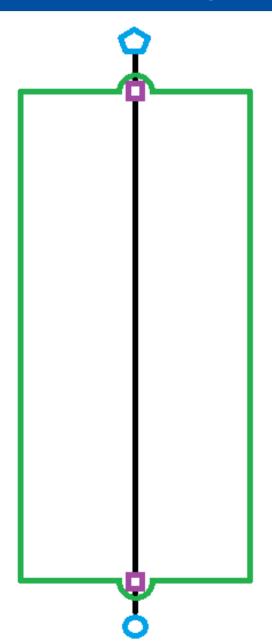


Vellbore	Profile										
Add A	dditional T	erminus Location									
learest (Distance f	from the First/Last	Take Point (Heel/Toe) to	a Lease Li	ine: [100.0	Nearest Perpe	endicular Distance	from Any	Take Point to a Lease Line:	330.0
	Se Abstract	, select the Count ction: 14 #: A- 4345 tion about the local		Block	C20		reserva	anually. ANDERSON, L W		Map	
elete	Name	Profile		Distance	(ft)	Direction		Distance (ft)		Direction	
0	TH1	Terminus Point	Lease	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
			Survey	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
		Last Take Point	Lease	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
		First Take Point	Lease	330.0	feet	from the NORTHEAST	line	and 1830.0	feet	from the WEST	line
		Penetration Point	Lease	747.0	feet	from the NORTH	line	and 560.0	feet	from the NORTHEAST	line

SPECIAL HORIZONTAL FIELD RULES



- SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



FIELD RULES- DUAL LEASE LINE RULES



Special Horizontal Field Rules: For informational purposes only. The Final Order controls all field rules.

Illustration Screen Help

Subsurface Tolerance Box: 50 feet

Unconventional Fracture Treated (UFT): Yes UFT Effective Date: 05/10/2016

Correlative Interval: From 6865 to 10605 feet Established by API Number: 32931029

Dual Lease Line Take Point Spacing

First/Last Take Points (Heel and Toe) to Lease Line: 100 feet

Perpendicular Spacing from All Take Points to Lease Line: 330 feet

Between-Well Spacing

Horizontal to Vertical: 0 feet Horizontal to Horizontal: 0 feet

Overlap Distance: N/A

Stacked Lateral Rules: Yes (If yes, see Final Order for details)

Special Rule 38 (Well Density) Provision

Upper: 79 acres Notification Radius: 660 feet

Lower: 20 acres

Comments for the Special Field Rules

Comments: DOCKET 7C-0291171 CONTAINS THE SAME INFORMATION AS 7C-0291169.

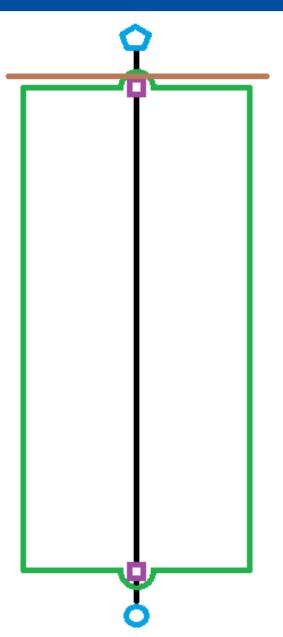
History: Final Orders that contain special horizontal field rules language

Docket Number	Final Order Effective Date	Final Order Document
7c-0291169	12/02/2014	Click Here
7C-0297471	03/08/2016	Click Here

SPECIAL HORIZONTAL FIELD RULES- FTP & LTP



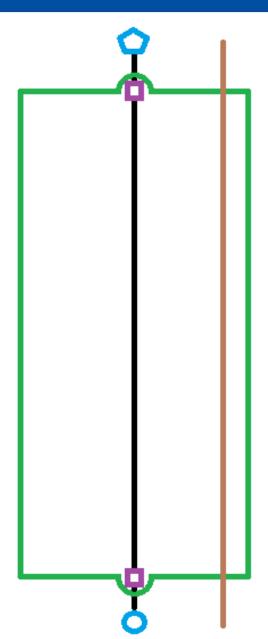
- ♦ SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



SPECIAL HORIZ. FIELD RULES- PERPENDICULAR



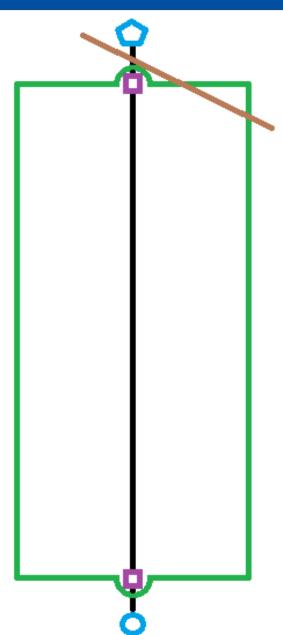
- ♦ SHL
- O BHL
- Wellbore
- □ Take Points
- Field Rules
- Lease Lines



SPECIAL HORIZ. FIELD RULES- DUAL COMPLIANCE



- SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines

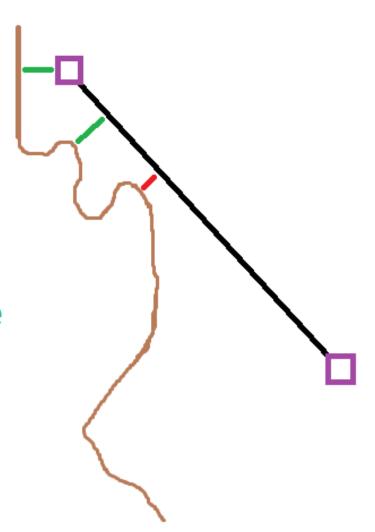


SPECIAL HORIZONTAL FIELD RULES-SPECIAL



River Lease Lines

- Wellbore
- Lease Line
- □ Take Points
- Legal Distance
- SWR 37



QUESTIONS?



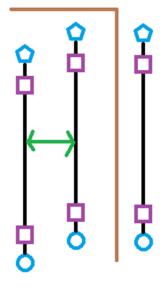


STATEWIDE RULE 37 BETWEEN WELL



Between Well

- SHL
- O BHL
- Wellbore
- ☐ Take Points
- Field Rules
- Lease Lines



- Producing part of the well is too close to producing portion of another well in the same LEASE and FIELD
- Wells owned by other operators can be the nearest well if in the same LEASE and FIELD

STATEWIDE RULE 37 NOTIFICATION- BETWEEN WELL



Notification Parameters

- Offsets within the greater of the lease line spacing or 1/2 of the between well spacing AND each adjacent tract
- It is possible to have an affected offset that is not adjacent, but are still within the notification area



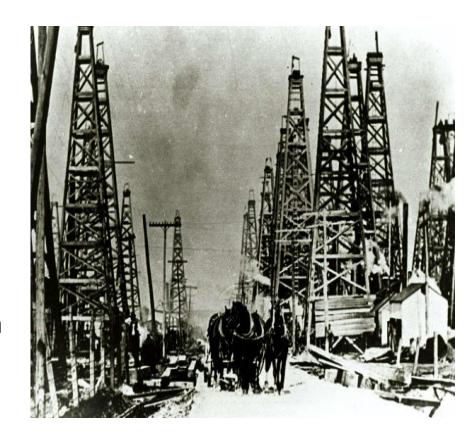
STATEWIDE RULE 38



TOO MUCH OIL NOT ENOUGH SPACE

- A SWR 38 is triggered when there are more wells on the lease than allowed for by the field rules.
- Is your field classified as "UFT"? If so, an exception may not be required.

Note: In some cases, the use of Stacked Lateral provisions approved for your field or under SWR 86 can negate the need for a SWR 38 exception for a lease being developed with horizontal wells.



STATEWIDE RULE 38 NOTIFICATION





Notification Parameters

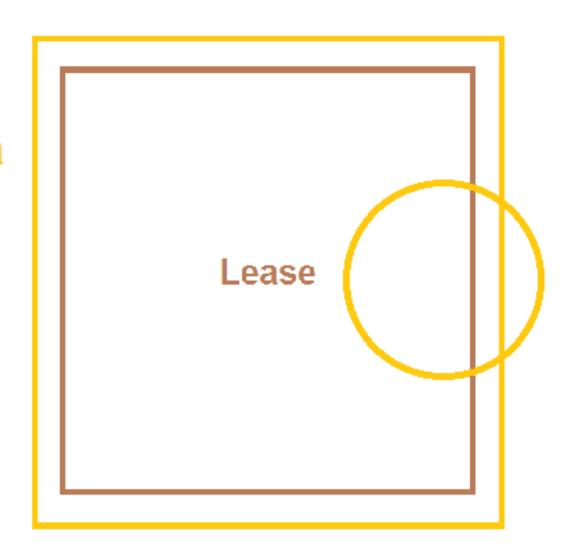
- Offsets within the lease line spacing AND each adjacent tract
- It is possible to have an affected offset that is not adjacent, but are still within the notification area
- Refer to your field rules or "UFT" rules for special notification areas

Statewide Rule 38 Notice Area



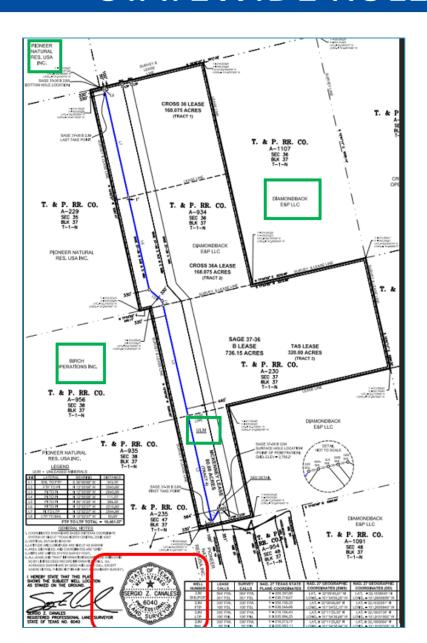
Between Well & SWR 38 notice area

- Lease Line
- Notice Area



STATEWIDE RULE 37 & 38- PLATS





- Plat must be certified with a signature or surveyor's stamp
- Plat must have offsets clearly labeled in the notification area

 If filing for a PSA or Allocation well the plat must show all tracts being developed

RESOLVING EXCEPTIONS





WHICH PATH SHOULD I TAKE?

THERE ARE SEVERAL
PATHS TO TAKE TO
RESOLVE YOUR
EXCEPTIONS. SOME CAN
BE QUICKER THAN
OTHERS.

RESOLVING WITHOUT AN EXCEPTION (1 OF 2)



Non-Concurrent Production:

For SWR 37 Between Well and SWR 38 a Non-Concurrent Production Restriction can be used

- Restriction stating that the applied for well and any wells on the restriction will not produce from the same field at the same time
- All wells that trigger an exception must be included in the restriction

RESOLVING WITHOUT AN EXCEPTION (2 OF 2)



Non-Perforation Zone:

 No Perf Zones are sections of wellbore that will not be perforated until the permit is amended to remove the No Perf Zone

 The No Perf Zone is clearly labeled along the wellbore on the plat with a begin and end point

 The length of the No Perf Zone must be clearly shown on the plat



Entity for Density:

 For SWR 37 Between Well an Entity for Density docket number can be used

 Some approved dockets for EFD'S may have special lease line requirements that require the operator to send out notice

RESOLVING WITHOUT NOTICE



Own Offset

- To qualify, all affected tracts identified must be 100% leased* to the applicant
- The plat must clearly be labeled with applicant's name in all affected tracts

*If less than 100% of the mineral tract is under lease then another resolution path will need to be taken for the rest of the mineral tract.

<u>Waiver</u>

- All affected operators, lessees, or unleased mineral owners must sign the waiver
- The plat must clearly be labeled with affected parties name in all affected tract
- Waivers from JOA partners may need more language concerning acreage assignments

Waiver



DATE

EXAMPLE

RULE 37 AND/OR RULE 38 WAIVER

OFFSET INC
P O BOX XXXXX
XXXXX, TEXAS XXXXX

RE: RULE 37 AND/OR RULE 38
LEASE NAME
COUNTY

THE APPLICANT IS REQUESTING AN EXCEPTION TO STATEWIDE RULE 37 AND/OR RULE 38 THE BELOW SIGNED HAS NO OBJECTIONS.

TITLE (OPTIONAL)

DATE:

RESOLVING WITH UNAFFECTED STATUS

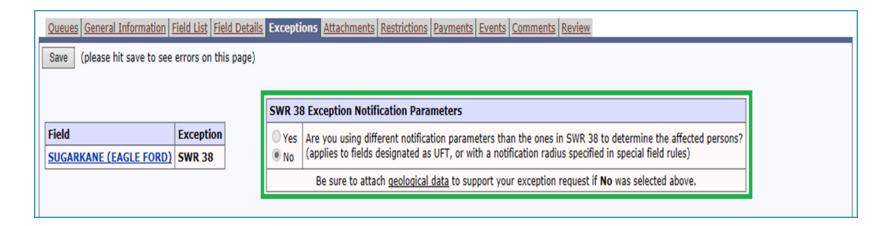


 For SWR 37 and SWR 38 exceptions affected tracts located in another state or country can be classified as unaffected

 For SWR 37 Between Well and SWR 38 any affected offsets that are greater than 1 mile from the producing portion of the well may be deemed unaffected after review of supporting documentation provided by the applicant

RESOLVING WITH SPECIAL NOTICE





 Some field rules allow for reduced notification parameters in identifying affected parties

 Unconventional Fracture Treated (UFT) fields for certain exceptions have reduced notification parameters in identifying affected parties

RESOLVING WITH NOTICE



Notice of Application

- Unleased affected parties are listed on the service list provided with the application
- The plat must clearly be labeled with name of affected party in all affected tracts
- Commission will generate a 21-day notice that will be sent to the parties identified on the service list

Publication

- Unleased affected parties are listed on the service list provided with the application
- The plat must clearly be labeled with name of affected party in all affected tracts
- A "Due Diligence" Letter provided with application requesting along with 21day notice you be allowed to publish for unknown addresses or parties. Letter also explain steps taken to find those affected parties

IMPORTANCE OF DATES



RAILROAD COMMISSION OF TEXAS OIL AND GAS DIVISION

DISTRICT 06

DATE OF ISSUANCE: Apr 10, 2018

NOTICE OF PROTEST DEADLINE: 5:00 PM, May 1, 2018

Address: Railroad Commission of Texas

ATTN: Drilling Permit Unit,

P. O. Box 12967

Austin, Texas 78711-2967

Fax: (512) 463-6780

Email: SWR37@RRC.TEXAS.GOV

Rule 37 Case No. Status/Permit No.

IMPORTANCE OF INSTRUCTIONS



As you have an offsetting or affected operator, lessee and/or mineral interest owner to your tract whom you cannot locate, you must give "notice by publication". A copy of the Railroad Commission's notice, must be published in a newspaper in the county where your tract is located. Such notice is your responsibility and must be published once each week for two (2) consecutive weeks. If you cannot meet the 14-day requirement due to newspaper filing deadlines it is your responsibility to contact the Drilling Permit Unit and request a new term out date for your publication. If you don't meet the requirements as laid out in SWR 3.37 or SWR 3.38 you will be required to re-publish your notice. The first publication date must be at least 14 days before the termination date on the notice of application. Proof of publication must be filed for the record. A publisher's affidavit must be submitted. Mail a hard copy of the affidavit to Railroad Commission of Texas, PO BOX 12967, Austin TX 78701. Or you may e-mail a scanned image of this affidavit to:

SWR37@RRC.TEXAS.GOV. The entire notice excluding the service list and notice of protest letter must be published. Upon receipt of the publisher's affidavit by the Drilling Permit Unit, and there being no protest received, a permit may be issued.

WHILE WE WAIT





- Notify applicant if any mail is returned
- Issue supplemental notices if required
- Provide new notices for publication if applicant requires one
- Receive and attach affidavits of publication to application
- Collect and attach any protests to the application

RESOLUTIONS- SWR 38 DATA REVIEW



SWR 38 Data

- Not required for SWR 38 exceptions in UFT fields unless applicant chooses to provide
- Not required for SWR 38 exceptions in fields with approved special rules unless applicant chooses to provide

Information that may be requested

Railroad Commission of Texas Oil and Gas Division - Permitting Services

GEOLOGICAL AND ENGINEERING DATA REQUIRED FOR STATEWIDE RULE 38 ADMINISTRATIVE EXCEPTIONS

Applicants for exceptions to Statewide Rule 38 density provisions are required to submit the following engineering and geological information for each applied-for field in support of the request when seeking administrative approval.

FOR ALL APPLICATIONS

- Area map showing mineral ownership of offsetting wells, offsetting leases, and unleased tracts.
- 2. Cross section(s) indicating continuity or discontinuity of reservoir.
- 3. Structure map and/or isopach map indicating limits of reservoir (if relevant).
- Recoverable reserve calculations for subject lease, pooled unit, or unitized tract, with supporting data.
- Cumulative production from wells on subject lease, pooled unit, or unitized tract that ever produced from each applied-for field.
- Estimated of remaining recoverable reserves from existing wells on subject lease, pooled unit, or unitized tract, with supporting data.

WHEN THE REQUESTED EXCEPTION IS TO PREVENT WASTE

- 7. Items 1-6, above.
- Estimate of remaining recoverable reserves from offset wells affective subject lease, pooled unit, or unitized tract, with supporting data.
- Cumulative production from offset wells affecting subject lease, pooled unit, or unitized tract.
- Amount of recoverable reserves which will not be recovered by wells on or affecting the subject lease, pooled unit, or unitized tract.

Other relevant information may be required to evaluate the request. If any of the above required data cannot be submitted, the applicant must include a written explanation.

April 1997

See notice on reverse side

RESOLUTIONS-SUPPORTING DATA EXAMPLE



Original Recoverable Oil & EUR Comparison Three Rivers Operating Company II, LLC Louis 3112 - Upton County, TX Spraberry (Trend Area) Field

EUR for Entire 640 Acres:

Average Porosity =	12%
Average Water Saturation =	25%
Bo =	1.4 bbl/STB
Acres =	640
Estimated Net Pay =	240
Oil in Place =	76,604,709 STBs
Recovery Factor =	3%

Original Recoverable Oil = 2,298,141 STBs

Three Rivers has rights to produce from depths below the base of the Spraberry.

These volumetrics and EURs apply only to the interval for which Three Rivers has rights to produce. There are 4 wells currently producing in the same interval:

	Cum. Oil (STBs)	EUR (STBs)
Louis 3142	7,760	145,542
Louis 3131	24,009	72,826
Louis 3114	7,539	30,098
Louis 3133	7,294	50,758
Total	46,602	299,224

Remaining Reserves Left to Recover

1,998,917.26 STBs

ALTERNATIVE TO A SWR 38 EXCEPTION



FORM W-1A

Providing the W-1A date may resolve exception if:

- The date the tract (lease) took its current size and shape is prior to the field rules going into effect a permit may be granted for the first well with substandard acreage.
- This is the last well on the lease and you have the specified tolerance acreage available AND the tract (lease) took its current size and shape prior to the field rules going into effect then then a permit may be granted with sub-standard acreage.

FORM W-1A



RAILROAD COMMISSION OF TEXAS Oil and Gas Division PO Box 12967 Austin, Texas 78711-2967 www.rrc.state.tx.us

SUBSTANDARD ACREAGE CERTIFICATION

W-1A

Revised 05/2001

Operator Nam	e	2. Operator P-5 Number	3. RRC Distri	RRC District Number	
4. Lease, Pooled	Unit or Unitized Tract Name	5. Lease/ID Number (# ass	(igned) 6. Purpose of	Purpose of Filing	
7. Total Acres in	Lease, Pooled Unit or Unitized Tract	8. Well Number		Only Well Surplus Acreage Other Docket #	
9. County		10. API Number			
11. Field 1		RRC use only Disc. Date	Rules Eff. Date	Rules Amd. Date	
12. Field 2		Disc. Date	Rules Eff. Date	Rules Amd. Date	
13. Field 3		Disc. Date	Rules Eff Date	Rules Amd. Date	
)	ATION FOR AN OPERATOR SEEKING A PE SUBSTANDARD ACREAGE AS DEFINED B e, pooled unit or unitized tract was e	Y EITHER STATEWIDE RULE 38 OR	BY SPECIAL FIELD	RULES.	
		and has re	mained as such s	since that date	
::	(mmddyy)	and has re	mained as such s	since that date	
. The own	(mmddyy) ership in this lease, unitized tract or t	-		since that date	
I) k	TOTAL OF CONTROL OF THE CONTROL OF T	he drill site tract of a pooled unit	has not:		

approved development or allowable purpose.

CONTACT INFORMATION



For more questions concerning SWR 37 or SWR 38 exceptions contact

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Lorenzo Garza	512-463-6751	Lorenzo.Garza@rrc.texas.gov

Evaluation & Archive Video



Evaluation

 Please complete the evaluation available on the RRC website at https://survey.alchemer.com/s3/6403402/202
 1-RRC-Regulatory-Webinars-Oil-Gas-and-Pipeline-Safety-Evaluation

Archive Video

 A link to the archive video of the webcast will be available on the same webpage as the presentation.